

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION, et al. v. BLACKBAUD, INC., et al.	CIVIL ACTION NO. 24-3993 (Hon. Harvey Bartle, III) Oral Argument Requested Motion Day: September 3, 2024
ATLAS DATA PRIVACY CORPORATION, et al. v. WHITEPAGES, INC., et al.	CIVIL ACTION NO. 24-3998
ATLAS DATA PRIVACY CORPORATION, et al. v. HIYA, INC., et al.	CIVIL ACTION NO. 24-4000
ATLAS DATA PRIVACY CORPORATION, et al. v. WE INFORM, LLC, et al.	CIVIL ACTION NO. 24-4037
ATLAS DATA PRIVACY CORPORATION, et al. v. INFOMATICS, LLC, et al	CIVIL ACTION NO. 24-4041
ATLAS DATA PRIVACY CORPORATION, et al. v. THE PEOPLE SEARCHERS, LLC, et al.	CIVIL ACTION NO. 24-4045

ATLAS DATA PRIVACY CORPORATION, et al. v. COMMERCIAL REAL ESTATE EXCHANGE, INC., et al.	CIVIL ACTION NO. 24-4073
ATLAS DATA PRIVACY CORPORATION, et al. v. DM GROUP, INC., et al.	CIVIL ACTION NO. 24-4075
ATLAS DATA PRIVACY CORPORATION, et al. v. CARCO GROUP INC., et al.	CIVIL ACTION NO. 24-4077
ATLAS DATA PRIVACY CORPORATION, et al. v. DELUXE CORPORATION, et al.	CIVIL ACTION NO. 24-4080
ATLAS DATA PRIVACY CORPORATION, et al. v. TWILIO INC., et al.	CIVIL ACTION NO. 24-4095
ATLAS DATA PRIVACY CORPORATION, et al. v. QUANTARIUM ALLIANCE, LLC, et al.	CIVIL ACTION NO. 24-4098
ATLAS DATA PRIVACY CORPORATION, et al. v. YARDI SYSTEMS, INC., et al.	CIVIL ACTION NO. 24-4103

ATLAS DATA PRIVACY CORPORATION, et al. v 6SENSE INSIGHTS, INC., et al.	CIVIL ACTION NO. 24-4104
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ATLAS DATA PRIVACY CORPORATION, et al. v. SEARCH QUARRY, LLC, et al.	CIVIL ACTION NO. 24-4106
ATLAS DATA PRIVACY CORPORATION, et al. v. ACXIOM, LLC, et al.	CIVIL ACTION NO. 24-4107
ATLAS DATA PRIVACY CORPORATION, et al. v. ENFORMION, LLC, et al.	CIVIL ACTION NO. 24-4110
ATLAS DATA PRIVACY CORPORATION, et al. v. COSTAR GROUP, INC., et al.	CIVIL ACTION NO. 24-4111
ATLAS DATA PRIVACY CORPORATION, et al. v. ORACLE INTERNATIONAL CORPORATION, et al.	CIVIL ACTION NO. 24-4112

ATLAS DATA PRIVACY CORPORATION, et al. v. RED VIOLET, INC., et al.	CIVIL ACTION NO. 24-4113
ATLAS DATA PRIVACY CORPORATION, et al. v. RE/MAX, LLC, et al.	CIVIL ACTION NO. 24-4114
ATLAS DATA PRIVACY CORPORATION, et al. v. EPSILON DATA MANAGEMENT, LLC, et al.	CIVIL ACTION NO. 24-4168
ATLAS DATA PRIVACY CORPORATION, et al. v. PEOPLE DATA LABS, INC., et al.	CIVIL ACTION NO. 24-4171
ATLAS DATA PRIVACY CORPORATION, et al. v. LABELS & LISTS, INC., et al.	CIVIL ACTION NO. 24-4174
ATLAS DATA PRIVACY CORPORATION, et al. v. CLARITAS, LLC, et al.	CIVIL ACTION NO. 24-4175
ATLAS DATA PRIVACY CORPORATION, et al. v. INNOVIS DATA SOLUTIONS INC., et al.	CIVIL ACTION NO. 24-4176

ATLAS DATA PRIVACY CORPORATION, et al. v. ACCURATE APPEND, INC., et al.	CIVIL ACTION NO. 24-4178
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ATLAS DATA PRIVACY CORPORATION, et al. v. TELTECH SYSTEMS, INC., et al.	CIVIL ACTION NO. 24-4217
ATLAS DATA PRIVACY CORPORATION, et al. v. PEOPLECONNECT, INC., et al.	CIVIL ACTION NO. 24-4227
ATLAS DATA PRIVACY CORPORATION, et al. v. CORELOGIC, INC., et al.	CIVIL ACTION NO. 24-4230

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ATLAS DATA PRIVACY CORPORATION, et al. v. ZILLOW, INC., et al.	CIVIL ACTION NO. 24-4256
ATLAS DATA PRIVACY CORPORATION, et al. v. EQUIMINE, INC., et al.	CIVIL ACTION NO. 24-4261
ATLAS DATA PRIVACY CORPORATION, et al. v. THOMSON REUTERS CORPORATION, et al.	CIVIL ACTION NO. 24-4269
ATLAS DATA PRIVACY CORPORATION, et al. v. CHOREOGRAPH LLC, et al.	CIVIL ACTION NO. 24-4271
ATLAS DATA PRIVACY CORPORATION, et al. v. TRANSUNION, LLC, et al	CIVIL ACTION NO. 24-4288
ATLAS DATA PRIVACY CORPORATION, et al. v. MELISSA DATA CORP., et al.	CIVIL ACTION NO. 24-4292

ATLAS DATA PRIVACY CORPORATION, et al. v. EQUIFAX INC., et al.	CIVIL ACTION NO. 24-4298
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ATLAS DATA PRIVACY CORPORATION, et al. v. TELNYX LLC, et al.	CIVIL ACTION NO. 24-4354
ATLAS DATA PRIVACY CORPORATION, et al. v. GOHUNT, LLC, et al.	CIVIL ACTION NO. 24-4380
ATLAS DATA PRIVACY CORPORATION, et al. v. ACCUZIP, INC., et al.	CIVIL ACTION NO. 24-4383
ATLAS DATA PRIVACY CORPORATION, et al. v. SYNAPTIX TECHNOLOGY, LLC, et al.	CIVIL ACTION NO. 24-4385

ATLAS DATA PRIVACY CORPORATION, et al. v. JOY ROCKWELL ENTERPRISES, INC., et al.	CIVIL ACTION NO. 24-4389
ATLAS DATA PRIVACY CORPORATION, et al. v. FORTNOFF FINANCIAL, LLC, et al.	CIVIL ACTION NO. 24-4390
ATLAS DATA PRIVACY CORPORATION, et al. v. MYHERITAGE, LTD., et al.	CIVIL ACTION NO. 24-4392
ATLAS DATA PRIVACY CORPORATION, et al. v. E-MERGES.COM, INC., et al.	CIVIL ACTION NO. 24-4434
ATLAS DATA PRIVACY CORPORATION, et al. v. WILAND, INC., et al.	CIVIL ACTION NO. 24-4442
ATLAS DATA PRIVACY CORPORATION, et al. v. ATDATA, LLC, et al.	CIVIL ACTION NO. 24-4447
ATLAS DATA PRIVACY CORPORATION, et al. v. PRECISELY HOLDINGS, LLC, et al.	CIVIL ACTION NO. 24-4571

ATLAS DATA PRIVACY CORPORATION, et al. v. NUWBER, INC., et al.	CIVIL ACTION NO. 24-4609
ATLAS DATA PRIVACY CORPORATION, et al. v. ROCKETREACH LLC, et al.	CIVIL ACTION NO. 24-4664
ATLAS DATA PRIVACY CORPORATION, et al. v. OUTSIDE INTERACTIVE INC., et al.	CIVIL ACTION NO. 24-4696
ATLAS DATA PRIVACY CORPORATION, et al. v. VALASSIS DIGITAL CORP., et al.	CIVIL ACTION NO. 24-4770
ATLAS DATA PRIVACY CORPORATION, et al. v. THE LIFETIME VALUE CO. LLC, et al.	CIVIL ACTION NO. 24-4850
ATLAS DATA PRIVACY CORPORATION, et al. v. BELLES CAMP COMMUNICATIONS, INC., et al.	CIVIL ACTION NO. 24-4949
ATLAS DATA PRIVACY CORPORATION, et al. v. FIRST AMERICAN FINANCIAL CORPORATION., et al.	CIVIL ACTION NO. 24-5334

ATLAS DATA PRIVACY CORPORATION, et al. v. PROPERTY RADAR INC., et al.	CIVIL ACTION NO. 24-5600
ATLAS DATA PRIVACY CORPORATION, et al. v. THE ALESCO GROUP, L.L.C., et al.	CIVIL ACTION NO. 24-5656
ATLAS DATA PRIVACY CORPORATION, et al. v. SEARCHBUG, INC., et al.	CIVIL ACTION NO. 24-5658
ATLAS DATA PRIVACY CORPORATION, et al. v. AMERILIST, INC. et al.	CIVIL ACTION NO. 24-5775
ATLAS DATA PRIVACY CORPORATION, et al. v. LEXISNEXIS RISK DATA MANAGEMENT, LLC, et al.	CIVIL ACTION NO. 24-6160

MOTION TO DISMISS PLAINTIFFS' COMPLAINT

PLEASE TAKE NOTICE that on September 3, 2024, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants, shall move before The Honorable Harvey Bartle III, United States District Judge, at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building &

U.S. Courthouse, 4th Cooper Streets, Camden, New Jersey 08101, to dismiss, with prejudice, Plaintiffs' Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) (the "Motion to Dismiss").

PLEASE TAKE FURTHER NOTICE that any opposition to the Motion to Dismiss shall be due on or before July 15, 2024, and any reply in support of the Motion to Dismiss shall be due on or before July 30, 2024.

PLEASE TAKE FURTHER NOTICE that in support of this Motion to Dismiss, the Defendants will rely upon the Memorandum of Law in Support of the Motion to Dismiss, the Declaration of Serrin Turner, and the exhibits thereto, and Request for Judicial Notice submitted herewith, as well as any submissions offered on reply.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

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